## LAVIN, CEDRONE, GRAVER, BOYD & DISIPIO

ATTORNEYS AT LAW 420 LEXINGTON AVENUE GRAYBAR BUILDING SUITE 335

> NEW YORK, NY 10170 (212) 319-6898

> > FAX: (212) 319-6932

WWW.LAVIN-LAW.COM

NEW JERSEY OFFICE 1300 ROUTE 73 SUITE 307 MT. LAUREL, NJ 08054 (856) 778-5544

FAX: (856) 778-7403

WRITER'S EMAIL ADDRESS MWOZNY@LAVIN-LAW.COM

May 28, 2020

## **Via Electronic Filing**

PHILADEPLHIA OFFICE

SUITE 500

190 NORTH INDEPENDENCE MALL WEST

6TH & RACE STREETS

PHILADELPHIA, PA 19106

(215) 627-0303

FAX: (215) 627-2551

WRITER'S DIRECT DIAL

215-351-7576

Honorable Ramon E. Reyes, Jr. United States District Court for the Eastern District of New York 225 Cadman Plaza, Room N208 Brooklyn, NY 11201

RE: Anton Katz v. Tesla, Inc.

U.S.D.C. for the E.D. of NY; Docket No. 19-cv-02855-RER

File No. 10121-1908468

Dear Judge Reyes:

In compliance with Your Honor's May 21, 2020 Order in the above matter, the parties jointly submit this letter as a status update.

This matter settled on March 25, 2020. After negotiations regarding certain specific terms of the settlement agreement and release, the release was finalized and transmitted to counsel for Plaintiff on April 23, 2020.

It is understood that Plaintiff has no objections to the terms of the release as transmitted, but as a result of complications arising from the pandemic, Plaintiff has not yet been able to execute the settlement agreement.

As such, the parties respectfully request a 2 week extension until June 10, 2020 for Plaintiff to execute the release and for a stipulation of dismissal to be filed.

## 

## LAVIN, CEDRONE, GRAVER, BOYD & DISIPIO

May 28, 2020 Page 2

Thank you for your consideration regarding the above. Should Your Honor have any questions or concerns, the parties will make themselves available at the Court's convenience.

Respectfully,

s/Michael J. Wozny

Michael J. Wozny

MJW/ch

cc: Jason Greshes, Esquire (via email)

2162248v1